

**PATRICK W. KANG, ESQ.**

Nevada Bar No.: 10381

**KYLE R. TATUM, ESQ.**

Nevada Bar No.: 13264

**PAUL H. WOLFRAM, ESQ.**

Nevada Bar No.: 16025

**KANG & ASSOCIATES, PLLC**

6420 West Spring Mountain Road, Suite 16

Las Vegas, Nevada 89146

P: 702.333.4223

F: 702.507.1468

[pkang@acelawgroup.com](mailto:pkang@acelawgroup.com)

[filing@acelawgroup.com](mailto:filing@acelawgroup.com)

*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

FREDDY HWANG, an Individual; SAPPORO  
GROUP NEVADA, INC., a Domestic  
Corporation;

PLAINTIFFS,

v.

REDWOOD FIRE & CASUALTY  
INSURANCE COMPANY, a Foreign  
Corporation DOES 1 through 25, inclusive; and  
ROE CORPORATIONS 1 through 25,  
inclusive,

DEFENDANTS.

Case No.: 2:22-cv-00879-JCM-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(THIRD REQUEST)**

**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (THIRD  
REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiffs, FREDDY HWANG, an Individual, SAPPORO GROUP NEVADA, INC., a Domestic Corporation and Defendants, REDWOOD FIRE AND CASUALTY INSURANCE COMPANY, a Foreign Corporation, by their respective counsel, as follows:

**Discovery Completed**

1. Plaintiff has tendered Initial Disclosures and multiple supplements thereto;
2. Plaintiff has served written discovery requests to Defendant including requests for admissions, requests for production of documents, and interrogatories;
3. Defendant has tendered Initial Disclosures;
4. Defendant has served written discovery requests to Defendant including requests for admissions, requests for production of documents, and interrogatories;
5. Plaintiff has responded to Defendant's written discovery requests;
6. Defendant has responded to Plaintiff's written discovery requests;
7. Plaintiff has provided his expert disclosures;
8. Defendant has provided its expert disclosures;
9. Defendant has conducted the deposition of the Plaintiff and Plaintiff's expert;
10. Plaintiff has conducted the depositions of Defendant's representatives; and
11. Both parties have noticed the depositions of a number of other witnesses and/or parties.

**Discovery to be Completed**

1. Deposition of Defendant's FRCP 30(b)(6) Witness;
2. Depositions of any and all experts disclosed by the parties;
3. Depositions of additional fact witnesses; and
4. All other discovery that may become necessary as litigation continues.

**The Parties Have Agreed to Extend Discovery**

The parties have acted in good faith in attempting to comply with discovery deadlines. As the parties have attempted to complete necessary discovery there have been some delays in coordinating the depositions of a number of witnesses in order to accommodate the schedules of the deponents and counsel. Defendant has also been forced to file a Motion to Compel and for Contempt against a fact witness, Roy T. Bent, in the United States District Court for the

Southern District of California as a result of Mr. Bent's refusal to comply with a Subpoena for his deposition. A copy of that Motion is attached hereto as **Exhibit A**. The hearing on the Motion was set on an expedited basis for February 10, 2023. The parties are amicably working towards a resolution to ensure that all depositions move forward in a manner that is satisfactory for all parties. Therefore, the parties have agreed for a need to briefly extend the discovery deadlines in order to come to a resolution and accommodate the availability of the remaining depositions.

Therefore, the parties seek a 30-day extension in order to carry out remaining discovery. Counsel is in no way attempting to delay discovery in this matter, as they have been working to complete discovery in good faith.

### **PROPOSED SCHEDULE OF DISCOVERY**

The parties hereby stipulate to continue the Discovery as follows:

	<b><u>Current Deadline</u></b>	<b><u>New Deadline</u></b> <del>Proposed</del>
Discovery Deadline:	February 28, 2023	<b>March 30, 2023</b>
Dispositive Motions:	March 30, 2023	<b>April 28, 2023</b>
Joint Pre-Trial Order:	May 1, 2023	<b>May 31, 2023</b>

### **Current Trial Date**

No trial dates have been set at this time.

Respectfully submitted,

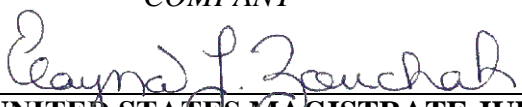
Approved as to Form and Content,

/s/Patrick W. Kang, Esq.\_\_\_\_  
 PATRICK W. KANG, ESQ.  
 KYLE R. TATUM, ESQ.  
 PAUL H. WOLFRAM, ESQ., ESQ.  
 KANG & ASSOCIATES, PLLC  
 Attorneys for Plaintiff  
 FREDDY HWANG

/s/ Michael W. Melendez, Esq.  
 MICHAEL W. MELENDEZ, ESQ.  
 COZEN O'CONNOR  
 Attorneys for Defendant  
 REDWOOD FIRE AND  
 CASUALTY INSURANCE  
 COMPANY

**IT IS SO ORDERED.**

**DATED: January 31, 2023**

  
 UNITED STATES MAGISTRATE JUDGE